

**DECLARATION OF PETER PERKOWSKI**

I, Peter Perkowski, declare as follows:

1. I am over 18 years old and not a party to this action. I am an attorney with the law firm of Perkowski Legal, PC (“Firm”), which represents plaintiff Xposure Photo Agency Inc. in this matter.

2. On behalf of plaintiff, I filed a Complaint in this action on November 30, 2023. The Complaint named Christopher Brown as a defendant. The Complaint is Docket No. 1 in this action.

3. After filing the Complaint, I conducted research to determine Mr. Brown’s residential address in Los Angeles. In my research, I discovered an article published by a local news outlet titled “Chris Brown posts home address on social media while promoting public yard sale at his Tarzana home.” The body of the article contained a specific address in Tarzana, and articles from other news sources confirmed the same details. Though the article was published in November 2019, other internet sources dated in 2022 indicated that Mr. Brown still lived in Tarzana as of those dates. Even as of today, internet sources dated in 2024 continue to indicate that Mr. Brown lives at the Tarzana address.

4. I asked a professional process server to serve the Complaint and summons on Mr. Brown at the Tarzana address. At my request, the process server did so, as evidenced by the proof of service that I filed with this Court, by ECF, on March 27, 2024. The document is Docket No. 16.

5. Defendant has not filed or served a response to the Complaint and the time in which to do so has expired.

6. On April 1, 2024, the clerk entered default on the Complaint against Defendant Mr. Brown. The Default by Clerk is Docket No. 18 in this matter.

7. Mr. Brown is an adult, not an infant or incompetent person. He is a musical artist and entertainer, so the Servicemembers Civil Relief Act (50 U.S.C. § 521) does not apply.

1           8.     On April 23, 2024, I was contacted by a person claiming to be  
2 defendant's (non-litigation) legal representative, Matthew Kamen. During our email  
3 exchanges, I made Mr. Kamen aware of this action and of the necessity of filing a  
4 motion for default judgment in accordance with the Court's orders. In early July  
5 2024, I was subsequently put in touch with another legal representative, Jonathan  
6 Davis, who stated that he represented Mr. Brown. I also made Mr. Davis aware of this  
7 litigation.

8           9.     Thus far in this litigation, the Firm has incurred approximately \$1,051.25  
9 in costs. This amount includes:

Complaint filing fee:	\$402
Service of process:	\$149
Postage:	\$4.09
Electronic research (est.)	\$496.16

12  
13 The postage costs were for the mailing of the two requests for entry of default to the  
14 defendant's residential address, as well as for the mailing of the initial motion for  
15 default judgment and this renewed motion. The total costs incurred through  
16 judgment will therefore equal or exceed \$1,051.25.

17           10.    Simultaneous with the filing of this motion, I am serving notice of this  
18 motion, and the motion, on Defendant by mail at the address set forth in the  
19 Certificate of Service attached to the Memorandum of Points & Authorities.

20  
21           I declare under penalty of perjury under the law of the United States that the  
22 foregoing is true and correct. Executed this 4th day of September, 2024.

23  
24                               /s/ Peter Perkowski  
Peter Perkowski